<u>Remarks</u>

Reconsideration and allowance are requested in view of the above amendments and the remarks below. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application.

Claims 8 and 12-14 are rejected under 35 U.S.C. 101 as allegedly directed to a system that does not include hardware. Applicants respectfully disagree. Claim 8 includes a "receiving server" and an "originating server."

Claims 1, 8, and 15 are rejected under 35 U.S.C. 103(a) over Benson (U.S. Patent No. 5,819,272) in view of Strickler et al. (U.S. Patent No. 6,122,630), hereafter "Strickler." Claims 5-7, 12-14, and 19-21 are rejected under are rejected under 35 U.S.C. 103(a) over Benson. These rejections are defective because Benson and Strickler, taken alone or in combination, fail to disclose each and every feature set forth in the claims as required by 35 U.S.C. 103(a).

It should be noted that the Examiner has rejected independent claims 1, 8, and 15 over Benson in view of Strickler, while dependent claims 5-7, 12-14, and 19-21, which are dependent on independent claims 1, 8, and 15, respectfully, are rejected only over Benson. To this extent, the rejection of dependent claims 5-7,

12-14, and 19-21 is improper because these claims incorporate the features of

independent claims 1, 8, and 15, respectfully, which were rejected over Benson

in view of Strickler. Clarification is requested.

Independent claim 1 recites:

> A method for preventing an unread activity associated with a read/unread status of an email from being bounced-back to an originating server during a replication operation, comprising:
> storing an identification of an originating server of a replicated unread activity in an unread log of a receiving server;
> during a subsequent replication process initiated by the receiving server, preventing replication of the unread activity back to the originating server;
> during the subsequent replication process, replicating the unread activity to at least one other server not identified as the originating server;
> wherein storing an identification further comprises updating the unread log to include an unread entry corresponding to the replicated unread activity, and storing the identification of the originating server with the unread entry; and
> wherein preventing the replication of the unread activity back to the originating server further comprises examining the unread log to determine if any unread entries stored therein correspond to an unread activity received from the originating server and, during the subsequent replication process, not replicating any unread activity identified as being received from the originating server back to the originating server.

Benson and Strickler, taken alone or in combination, fail to disclose, *inter*

alia, preventing an unread activity associated with a read/unread status of an

email from being bounced-back to an originating server during a replication

operation, comprising: "storing an identification of an originating server of a

replicated unread activity in an unread log of a receiving server," "during a

subsequent replication process initiated by the receiving server, preventing

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replication of the unread activity back to the originating server," and "during the subsequent replication process, replicating the unread activity to at least one other server not identified as the originating server."

As admitted by the Examiner, Benson does not teach "preventing replication of the unread activity back to the originating server." Applicants agree.

To overcome this glaring deficiency of Benson, the Examiner relies on the disclosure of Strickler. In particular, the Examiner alleges that Strickler "explicitly states inhibiting a local node from posting selective transactions which were detected as being originally sent by a local node ... to control replication back to a local server and thus teaching preventing replication of the unread activity back to the originating server." Applicants disagree.

The "transactions" disclosed by Strickler are defined as "one or more individual steps and/or operations" that are "applied to one or more local and/or remote databases" and that a "characteristic of transactions is the requirement that either all steps and/or operations are applied or all are rolled back in the case of a problem so that the database(s) is always left in a consistent state" (col. 9, lines 8-21). Clearly, therefore, a "transaction" in Strickler does not correspond to an "unread activity associated with a read/unread status of an email." Thus, Strickler does not teach or suggest "preventing an unread activity associated with a read/unread status of an email from being bounced-back to an originating server during a replication operation."

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Independent claims 8, 15, and 22 are allowable for reasons similar to those set forth above with regard to independent claim 1.

With respect to the dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. The dependent claims are believed to be allowable based on the above arguments, as well as for their own additional features.

Accordingly, Applicants submit that all pending claims are allowable.

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

/ John A. Merecki /

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